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MAY 23 2019

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA.

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY CMT DEPUTY

Decoke Perkins

Plaintiff(s)

vs.

OO medicine

Defendant(s)

CIV 19 461
CASE NO. _____ **PRW**

COMPLAINT

Discrimination and Retaliation, Constructive Discharge
This statement has some things left out and
its not 100% accurate, but its just to give an
idea of whats going on.

NOTE: Your signature, address and phone number must appear at the end of each pleading.

I Decole Jasmine Perkins started clinical rotations at OU medical Center in August of 2014. I dedicated 1 year of service to learn how to be a Medical Laboratory Technician. I graduated for Rose State College May of 2015 with an associates in applied science specialty Medical Laboratory Technology. I was hired on payroll for a PRN position July 29 2015. I spoke with my manager Bobby Gramling that I will work PRN but I would like a full time position whenever you have no room for PRN. He agreed and I work a variety of shifts but was finally placed on an evening shift with another tech that was higher up then me. Her name is Cathy Provence and she has been with OU for over 20years and she is consider a lead tech. Right off she and some other coworker would say they had to baby sit which I brushed off. Over the next few months Cathy would yell, Hoover over me and watch me from a distance. I brushed it off but I did notify my manager Bobby. I would text him and tell him how Cathy is yelling at me and I don't appreciate it. He would tell me, "That's how she is." Over the next few months I rushed to finish my work to avoid being yelled out. Cathy would tell Bobby things that were not true about me because she would come in before me. He never told me one other former coworker name Markiesha Fields that work as a lab assistant in the even with us over heard her tell Bobby this and she told me she told him I did tell her I was leaving. After Markeisha left I had to take over the place plus my shift to. Eventually people started leaving and I started to help on the weekends with another tech Jackie Steber she was fairly new to the lab but she had been a tech with OU clinic for over 10years. I would do all the quality control for Chemistry, Blood Bank, Coagulation, and draw patients that need to be drawn. While she sat at the Hematology microscope looking at slides. I told, as well as other employees told our manager Bobby that we need a lab assistant on the weekend for the 12 hours shift. It was only two lab tech for the whole hospital with an ER. We never got a lab assistance and the work load was from the time we got to work until we left. I eventually ask Jackie if she could do more to help out and that's when the issue started with her. I'm still going through what I'm going through in the evenings with Cathy but now I'm going through the same thing with Jackie. She would withhold information and basically she tried to make me look incompetent. I keep in touch with my manager and told him what was going on. I reduced my work hours because I noticed I was getting tired. Eventually it got so bad that he had to come up to the job and speak with both of us. He told us we have to get along or we will both be let go. She said loudly in front of Bobby our manager, "NO BODY WANTS YOU HERE," This was in 2016 Or 2017. It was stressful and I figured it would blow over I had to provide for my kids. I eventually asked all my coworkers how they felt about working with me but of course they all said positive things. I could tell differently because I wouldn't get the same information they were getting. I still came in and performed my job by this time Bobby was aware that I had anxiety really the whole lab did. Eventually they had someone to work the weekends and I just worked the evening shift with an extra day a week added and I told Bobby I was recovering from depression and I needed to work more hours. I work four days a week Monday thru Thursday. Mon and Thursday was 4 to 12 because another coworker had another job.

September 2018 my schedule change from four days during the week, on the days I work 2 to 10 was giving to Jackie and Ali Bunch. I only worked 4 to 12pm on Monday and Thursday. I express my concern and told Bobby I can't provide for my family if I continue to work only two days a week. I explained to him that we had an agreement that if it comes a time where I needed to work full permanently and not PRN let me know so I won't be out of a job. Continuously reminding him throughout my career at OU. Well he said he didn't have and full time positions left even not the shift I had been working for the pass 3yrs. I started putting in applications everywhere and I had a couple interviews. One was a potential which was the Oklahoma Spine hospital. I still was putting in application and one application I put in was at OU medicine downtown. It was for a procedure tech. the next day I got a call from my manager at that time he was the Director and he said he was trying to see if I really wanted the position, I yes its downtown he said no it's at the Edmond campus. I said let me think about it and I text him back about 30min later and told him I wanted the position.

He didn't respond so I drove to meet with him about the position and when I got there he said we are giving that position to Jackie but we will be opening up a 2 to 10 position full time. I told him I'm still putting application and interviewing. Eventually I had my third interview with Oklahoma Spine hospital and was at that time the position for the evening tech opened up at OU medicine I put the application in one they and they made an offer the next day and so did Oklahoma Spine. I decided to go with Oklahoma Spine even though a comment Denise had made about one of her employee's issues in her establishment reminded me of what I been going through and went into the office to advise that I would be accepting an offer at Oklahoma Spine and Bobby the director told me I need to call HR so I did, I figured that was the process. OU counter offer Oklahoma Spines offer. I was shocked of the counter offer considering that it seem like they didn't want me to work there. I thought about it and I decided to stay because I been with the company so long and that showed me they valued me and The director Bobby was leaving so if all this was because of him I wouldn't have to go through it any longer. I stayed and felt like now things will be different. They were for about the two months. Then Cathy started back yelling orders and snatching things out of my hands. I told my supervisor Darlisha Ware since we were without a Director and she told me you can all ways find another job. I told her that's emotional abuse. She said so what you got to do. So I went to HR and spoke with Peggy Pickle and explained everything to her in less detail but she wrote it down and said she will discuss it with the new director the hired. Her name was Linda and I waited patiently because I didn't want to put all this on her. She ended up leaving after only 30days. I continued to make a note of issues. The last thing that had me go to EEOC was that the lab assistant Kristen Moore slammed some others down on the table and said did you call this result. I said no I faxed the order in because the doctor office was closed. Then she said I will just get someone else to call it and snatched the paper and walked off and sat in her chair. I walked over and asked her if she had a probably with me and she said that she was tired of cleaning up my mess. I explained to her that I had to do her job my job and I might miss some things because I'm being three people. I told her thank you for letting me know. She walked off and ended up in the break room telling another coworker what was said, and I stood there and listened and she said, may I help you and I said I was just listening she you are speaking on me. We went back and forth and eventually she said I don't respect you and it's a reason why I treat you differently than everyone else. I asked her why and she didn't say and I said what have I done for you not to respect me and she didn't say anything. I told her don't slam any paper down or snatch and papers up from again. After that I went to the EEOC and explained everything and they said do you want to file now after explaining to me that it doesn't fall up under their guidelines. I told them to hold off. I really didn't know what to do at this point. The stress had taking a toll on me to where I lost my confidence and didn't trust anyone at my job. I really didn't think I would be able to perform to the best of my ability at another place. I was tired. Then I got a call from Chloe Reid from a third party ethics officers. She called me and wanted to meet with me and said someone told her my name and said I might can help here with her compliant. I said, ok and meet with her and thought maybe this is pertaining to what I been going through and I told her everything once again. She said this is not for disciplinary action but to try and fix the issue. This was on Monday 11th of March 2019 and Wednesday I left for vacation and came back on the 26th of march 2019 and by the 28th of March the new Director Clark Houser which I had never met before except for when he did a walk through. The supervisor Darlisha ware and the acting director Darrin had me in the office with a verbal waring say that my behavior and conduct has come between the cohesiveness of the lab. Darrin said , we know you have been taking notes and keeping up with what's going on but this is not a written warning only a verbal written warning to help with fixing the issues of the lab. I refuse to sign, I went home very upset, hurt, I felt like that was a slap in the face. I went to the EEOC the next day and got a Dismissal letter notice of right to sue. I was originally working with Michelle Schultz but I guess we had some miscommunication because she was supposed to set an appointment for me to sign some paper work on Monday and it never happened. I been through a lot and I need a resolution I feel like I'm losing my mind. I don't know what is to do. ^{2/2} I been-

I am informing OU medicine that I will no longer be able to be employed by your organization. I have been with the company for almost five years. Five of those years being 1 year as a student. I have been reaching out to my director and supervisor for the past few years on ongoing issues in the laboratory. I no longer trust my coworkers or organization. Things have been said that shows me I am not valued as an employee and not wanted. I feel like I'm being made to look incompetent by my coworkers by withholding information and refusing to work with me properly with the intense work load. I have been to the Human Resources and spoke out about the issues and nothing was done. The issues are still happening. My health and state of mind has suffered and even though I have and others have asked for help with at least a lab assistant our request were overlooked. The work environment is very hostile and a lot of people are avoiding work because of this and it makes it harder on the next person when one person avoids the work load.

Yesterday 05/1/19 I returned to work after calling in sick the day before. I walked in and started working and I spoke to a couple of my coworkers and Valerie asked did you go to the doctor and get some antibiotics? Was it a 24 hour bug? The lab assistant Kristen slammed the specimen on the analyzer right next to me and the analyzer alarm went off. Then Janet approached me about a CAP survey I did a month ago without my original paper work for it and said I did the wrong specimen. I know I made sure I did the correct specimen. She also said Cathy called in and when she call in she is really sick. At this point, already not feeling well which I explained to them I'm still a little under the weather. I started crying and I explained to her I wouldn't intentionally sabotage a person career to make them look bad. I wouldn't get a thrill off of hurting my coworker. Starla the lab assistant was putting specimens every except for the proper place. The work load was too much and I wasn't getting any help because the one person that was there at that time had to work in blood bank. I can't be 3 or 4 people and be efficient with my work. I called the supervisor and when she came in I left. I have lost my confidence in my work as well as this company. I no longer have trust in the organization, because any time I have spoken out about these issues I'm made out to be the trouble maker. I can't continue to work in these conditions.

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05/02/19

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